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February 12, 2014

VIA ECF

Hon. Analisa Torres United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: Castro, et ano, individually and on behalf of all similarly situated employees v.

Shrager, et al., 13-cv-7365 (AT)(RLE)

Letter Motion Requesting a One Week Enlargement for Certification Briefing.

Your Honor:

We represent the Plaintiffs in this matter and submit this letter pursuant to Your Honor's Individual Rule of Practice 1D to request a one week enlargement of the time for Plaintiffs to file their moving papers seeking conditional certification currently due on February 14, 2014 (see Your Honor's Order dated February 3, 2014, Dkt. 15), as well as the period to move to amend the pleadings which currently closes on February 13, 2014 pursuant to the Civil Case Management and Scheduling Order signed by Your Honor on January 14, 2014. (Dkt. 13).

All counsel have diligently engaged in settlement negotiations, and expect to continue in earnest over the next few days. I respectfully request the brief (one week) enlargement in order to allow the parties time to pursue a final resolution prior to the submission of the Joint Status Letter due on February 14, 2014.

- 1. Period to amend pleadings: extended from February 13, 2014 to February 18, 2014
- 2. Motion for conditional certification:

Moving Papers to be filed on February 21 moved from February 14.

Opposition Papers to be filed on March 7 moved from February 28, and

Reply Papers to be filed on March 14 moved from March 7.

• No Prior request have been made.

- Defendants counsel has consented.
- No other dates will be affected by the proposed enlargement.

GARBARINI FITZGERALD P.C.

1: Kicken M.

Richard M. Garbarini

cc: Jeff Meyer (VIA ECF) Yale Pollack (VIA ECF)

Attorney for Defendants

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